



**Fw: AMENDMENT TO SAN LUIS OBISPO COUNTY GROWTH  
MANAGEMENT ORDINANCE (GMO)**

**Paul Teixeira** to: cr\_board\_clerk Clerk Recorder

05/20/2013 09:27 AM

Sent by: **Debbie Geaslen**

Paul Teixeira  
Supervisor District Four  
(805) 781-5450  
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----- Forwarded by Debbie Geaslen/BOS/COSLO on 05/20/2013 09:27 AM -----

From: Kathy Choate <kchoate@cambriacsd.org>  
To: "ccampa@co.slo.ca.us" <ccampa@co.slo.ca.us>, "fmecham@co.slo.ca.us" <fmecham@co.slo.ca.us>, "bgibson@co.slo.ca.us" <bgibson@co.slo.ca.us>, "ahill@co.slo.ca.us" <ahill@co.slo.ca.us>, "pteixeira@co.slo.ca.us" <pteixeira@co.slo.ca.us>, "darnold@co.slo.ca.us" <darnold@co.slo.ca.us>  
Cc: Jerry Gruber <JGruber@cambriacsd.org>, Amanda Rice <directorrice.ccsd@gmail.com>, "gailgra@charter.net" <gailgra@charter.net>, "hnybrs@aol.com" <hnybrs@aol.com>, "Jim Bahringer (jim@fogsend.com)" <jim@fogsend.com>, "mnclift@charter.net" <mnclift@charter.net>  
Date: 05/17/2013 04:40 PM  
Subject: AMENDMENT TO SAN LUIS OBISPO COUNTY GROWTH MANAGEMENT ORDINANCE (GMO)

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Good afternoon Cytasha,  
On behalf of CCSD General Manager Jerry Gruber, please find attached a letter regarding CCSD's request for amendments to the GMO with regard to Cambria.

Please enter this letter into the record at the May 21 board of supervisors meeting during the Growth Management Ordinance agenda item.

Thank you,  
Kathy

Kathy Choate  
District Clerk/Adm Asst  
Cambria Community Services District  
PO Box 65  
1316 Tamsen Street Suite 201  
Cambria CA 93428

Direct Line: 805-927-6235  
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2013 0517 Signed Ltr to County GMO w attachments.pdf

# CAMBRIA COMMUNITY SERVICES DISTRICT

## DIRECTORS:

MICHAEL THOMPSON, President  
JIM BAHRINGER, Vice President  
MURIL N. CLIFT  
AMANDA RICE  
GAIL ROBINETTE



## OFFICERS:

JEROME D. GRUBER, General Manager  
KATHY A. CHOATE, District Clerk  
TIMOTHY J. CARMEL, District Counsel

1316 Tamsen Street, Suite 201 • P.O. Box 65 • Cambria CA 93428  
Telephone (805) 927-6223 • Facsimile (805) 927-5584

May 17, 2013

Kami Griffin  
Assistant Director  
San Luis Obispo County  
Planning and Building Department  
976 Osos Street, Room 200  
San Luis Obispo, CA 93408

## Re: Amendment to San Luis Obispo County Growth Management Ordinance

Dear Ms. Griffin:

This letter is to follow up to my recent email to you, and the response I received from Senior Planner James Caruso, regarding amendments to the County's Growth Management Ordinance ("GMO") and to summarize the reasons we are requesting the amendments. In Mr. Caruso's email he indicated that we can initiate the process through a letter to you. Accordingly, I am writing to you at this time to request your assistance in moving forward with the process of amending the GMO. Given the positive relationship that exists between the CCSD and the County, we are certain that through a cooperative approach we can accomplish the necessary changes in an expeditious manner.

Mr. Caruso's email indicated that in our letter to you we should describe the CCSD's water conservation program, and suggested that a summary of the Water Use Efficiency Plan ("Plan") be provided. Accordingly, attached to this letter is Section 9 of the Plan. Of course, we will also provide you with a copy of the entire Plan for review. In addition, the CCSD's staff is currently in the process of developing procedures and amendments to the CCSD Municipal Code to implement the Interim Issuance of Intent to Serve Letters, which we expect to take to our Board of Directors within the next 60 days. Generally, this will consist of changes to the CCSD Municipal Code so that District's Water Conservation and Retrofit Program will operate in a manner that will result in offsetting all increased water use through the retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use.

To summarize what has taken place to this point, on March 21, 2013 the Board of Directors of the Cambria Community Services District ("CCSD") adopted a resolution (CCSD Resolution 09-2013) to provide for the issuance of intent to serve letters while the District continues to pursue a long-term supplemental water supply project ("Interim Issuance of Intent to Serve Letters"). A copy of Resolution 09-2013 is attached for your reference. Resolution 09-2013 modified the regulations and restrictions that were previously adopted to implement the CCSD's Water Code Section 350 Water Shortage Emergency that was declared on November 15, 2001. Resolution 09-2013 will provide for

ITEM NO. 32 MEETING DATE: MAY 21, 2013  
PRESENTED BY: KATHY CHOATE  
REC'D PRIOR TO MEETING & POSTED ON: MAY 20, 2013

the Interim Issuance of Intent to Serve Letters, based upon offsetting increased water use through the retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use. As with any program that will allow new development, there are some in Cambria who oppose this new program and who opposed the adoption of Resolution 09-2013. This included an attorney who questioned the CEQA exemptions being used. There was some concern that a lawsuit would be filed that would cause unwarranted and unnecessary delays (a copy of the Notice of Exemption is attached for your reference). No legal challenge, however, has been filed within the statutory period.

As you can see from a review of Resolution 09-2013, issuing Intent to Serve Letters predicated upon demonstrable offsetting of all increased water use through water conservation is consistent with and implements Cambria Communitywide Condition 4.B ("Condition 4.B") of the North Coast Area Plan, which as you know is part of the San Luis Obispo County's General Plan. That Condition provides that absent a new, major public works water supply project for Cambria, "...new development resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use..."

As you know, the County's GMO provides for an allocation limit for Cambria of not to exceed 2.3%, however, the allocation for years July 1, 2012 through June 30, 2015, contained in County Code Section 26.01.070 j (1)(b) has been set at 0%. The GMO's allocation of dwelling units is based upon a recognition of the CCSD's own allocation of resources, as provided in the District's management policies and ordinances. In this regard the CCSD's newly approved water management policy that provides for the Interim Issuance of Intent to Serve Letters will implement the existing Cambria Community Condition 4.B of the North Coast Area Plan. Moreover, it will result in significantly less than the number of dwelling units that could be allowed under the County's 2.3% GMO limit and will be further controlled by the amount of actual water conservation achieved within the District's service area. Therefore, it is appropriate for the County to amend the GMO to recognize and accommodate the CCSD's new allocation of resources, as provided for in Resolution 09-2013.

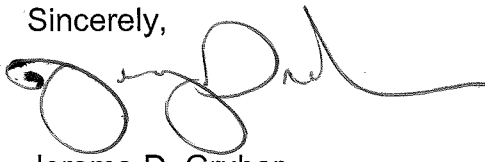
Mr. Caruso's email asked that we include a requested growth rate. The current draft of the Administrative Policy that we intend to take to our Board of Directors in June includes a procedure for the Board to determine on a quarterly basis of each allocation year how many Intent to Serve Letters are to be made available for issuance that quarter. The determination is to be based upon an analysis presented by CCSD staff related to the status of the CCSD's Points Bank and the amount of water conservation being achieved in the CCSD service area. The Points Bank represent retrofit points that accrue from the installation of high-efficiency water use fixtures and devices that result from retrofits required when there is a change of ownership or use (CCSD Municipal Code Section 4.16.050), expansion of use (CCSD Municipal Code Section 4.16.060), resale (4.16.070), CCSD rebate programs, and other actions by the CCSD to achieve verifiable reductions in existing water use in the Districts service area. In addition, the Board's determination is to take into account projections related to the amount of water savings that will be achieved by new projects, based upon installation of water savings plumbing fixtures and devices at the properties to be served by the new connections, and related demand offset calculations. The Administrative Policy will also provide that the number of new water connections are not to exceed the number of dwelling units permitted by the County's GMO.

Mr. Caruso also requested that we summarize the status of the CCSD's supplemental water project. At this time a draft EIR/EIS on Water Supply Alternatives is currently being prepared by the Army Corp of Engineers. Based upon the schedule prepared by the Army Corp, we anticipate that the draft EIR/EIS will be ready for distribution for the public review period in early January, 2014.

At this time we are respectfully requesting your assistance in initiating the process so that an agenda item can be prepared for the Board of Supervisors as soon as possible, allowing consideration of an appropriate amendment to the County's Growth Management Ordinance.

Please contact me as soon as possible so that we can discuss how best to proceed in this important matter. Thank you for consideration.

Sincerely,



Jerome D. Gruber  
General Manager  
Cambria Community Services District

JDG:kac

C: CCSD Board of Directors  
SLO County Board of Supervisors

Attachments: Section 9 from Draft Final Water Use Efficiency Plan for the Cambria Community Services District. Prepared by Maddaus Water Management, dated February 21, 2013  
CCSD Resolution 09-2013  
Notice of Exemption – Issuance of Intent to Serve Letters, Filed March 22, 2013

## **Section 9 from Draft Final Water Use Efficiency Plan for the Cambria Community Services District. Prepared by Maddaus Water Management, dated February 21, 2013**

### **9 . RECOMMENDED PLAN**

This section presents an overview of the recommended conservation plan for the Cambria Community Services District service area. The recommended plan includes several elements: (1) how the plan was selected from the alternatives presented in Section 8; (2) a more detailed description of the components including goals; (3) overall benefits of the plan; and (4) recommended next steps.

#### **9.1 Selection Criteria and Process**

The recommended plan was presented at a regularly scheduled Cambria CSD Board meeting held January 17, 2013. MWM presented the results of the evaluation of water conservation issues and options for Cambria CSD.

This activity brought the Board to a common level of understanding of water conservation issues for Cambria CSD. MWM also explained the various conservation program options that they had prepared for the Cambria CSD.

Decision criteria were reviewed with the group and were as follows:

- Cost-Effectiveness
- Water Savings
- Ease of Implementation
- Availability of Technology
- Average Annual Cost

#### **9.2 Description of Recommended Plan**

The recommended plan is to begin to implement Program B and after a few years consider expanding the plan to encompass Program C. The recommended plan's 16 measures are listed below.

##### **Recommended Measures in the Plan**

1. Reduce System Water Losses
2. Use Automatic Meter Reading System to Identify Customer Leaks
3. Public Information and Education
4. Single Family Surveys
5. Showerhead Giveaway
6. High Efficiency Toilet Rebates
7. High Efficiency Urinal Replacement
8. Fixture Replacement by ordinance
9. CII Surveys

10. Large Meter Replacement
11. Irrigation Upgrades
12. Multifamily Surveys
13. High Efficiency Washing Machine Rebates
14. Conservation Pricing
15. Implement CCSD Municipal Code to Prohibit Irrigation Water Waste
16. Hot Water Recirculation Incentive

### 9.3 Projected Water Savings of Plan

The Cambria CSD's service area has a relatively high portion of residential water use. Consequently, residential conservation programs produce the most savings. The Cambria CSD's service area is not an intense commercial area, and as a result the conservation potential in the commercial sector is less.

Overall conclusions are:

- The Plan (Program B) without the plumbing Code is estimated to save approximately 70 acre-feet by the year 2020. The benefit-cost ratio of the plan is less than 1.0 when compared to the current cost of pumping groundwater. However, Cambria has water supply constraints, so comparing the cost of conservation to the cost of the current supply may not be appropriate.
- Total savings from Program B is 10 percent (without the plumbing code) in 2020.
- The average cost of water saved for the plan from the utility standpoint (as shown on Table 8-4) is \$1,400 per AF.
- The cost for the conservation measures could be largely funded by the builders of the new homes.

### 9.6 Estimated Implementation Budget

The cost to Cambria CSD to implement the recommended plan is approximately \$300,000 per year of additional budget and includes additional staff time, materials, rebates, giveaways, etc. This budget was developed as part of the DSS Model evaluations for level of activity by year. The opportunities for State grants or cost sharing partnership with other County utilities or other means for lowering the cost of a conservation measure would lower the budgetary needs for implementation. The Cambria CSD should develop a detailed annual work plan, and use the DSS Model to monitor progress on demand reductions; along with updates to the implementation cost estimates and associated budgets on an annual basis.

### 9.7 Monitoring Progress

Each year a progress update will be used to analyze the progress on meeting the Plan targeted water savings. It will be imperative to track activities and also water demand to understand the level of progress being made in meeting overall targets.

### 9.8 Challenges Ahead and Recommended Next Steps

Successful implementation of the Plan will require a significant increase in efforts on the part of the Cambria CSD. Many new conservation measures will be employed and high participation rates are needed to achieve Plan goals. At current staffing and budget levels Cambria CSD would have difficulty implementing such an aggressive conservation program. Additional resources are needed.

Recommendations to assist with implementation include the following next steps:

- Budget an additional \$300,000 per year to cover the added cost of implementing this plan.
- Recover the costs by adjusting the current points program as needed or consider charging extra for new water meters to pay for the plan.
- Prioritize measures for implementation with those that contribute the most to meeting water saving targets given highest priority for implementation.
- Consider working with the largest water using customers to try to reduce water use as described in section 3.
- Develop an Implementation Plan that describes exactly how the plan measures will be implemented.
- Develop an annual work plan for each plan year as soon as budget is adopted (or in concert with budget planning process).
- Update codes and ordinances, as necessary.
- Form partnerships and apply for grants where appropriate.
- Contract if needed to gain enough staff support to help administer or accelerate the new program measures.
- Maintain the Cambria CSD Staff Conservation Working Group to guide the implementation.
- Develop analytical tools to track water use by customer class and overall water use reductions adjusted for the weather and external factors.
- Set up a database to store and manage measure participation, cost and other data to gauge successes and failures.
- Use the tools annually to help decide on priorities for the next plan year.
- Use the DSS Model to annually update the plan including actual measure participation, projected water savings and expected per capita water use reductions to ensure plan is on track to meet 2020 targets.
- Use the input from the Cambria CSD Staff Working Group and annual work planning process as the forum to amend the plan, budgets, staffing, contracting, schedule etc. to stay on track.



**RESOLUTION NO. 09-2013  
March 21, 2013**

**A RESOLUTION OF THE BOARD OF DIRECTORS  
OF THE CAMBRIA COMMUNITY SERVICES DISTRICT  
APPROVING THE ISSUANCE OF INTENT TO SERVE  
LETTERS ON AN INTERIM BASIS WHILE  
THE DISTRICT CONTINUES TO PURSUE A  
LONG-TERM SUPPLEMENTAL WATER SUPPLY PROJECT  
("INTERIM ISSUANCE OF INTENT TO SERVE LETTERS")**

**WHEREAS**, on November 15, 2001, after holding public hearings and receiving evidence and testimony the Board of Directors of the Cambria Community Services District ("District") determined that there was sufficient evidence to support the declaration of a water shortage emergency pursuant to the provisions of Section 350 of the California Water Code ("the Section 350 Declaration"); and

**WHEREAS**, thereafter, the Board of Directors also adopted regulations and restrictions pursuant to Water Code Section 353 to implement the Section 350 Declaration, which included the immediate suspension of the issuance of any additional intent to serve letters, which had the effect of creating a moratorium on new water service commitments; and

**WHEREAS**, on February 28, 2013 the Board of Directors approved a Water Use Efficiency Plan (the "WUEP"), which Plan will further the CCSD's Urban Water Master Plan (the "UWMP") goal of significantly reducing per capita water use, and make Cambria more sustainable within its existing water supply, as well as providing water to potentially serve a limited number of new connections while the CCSD pursues a long-term supplemental water supply project; and

**WHEREAS**, the implementation of "Program B" of the WUEP, in combination with more water efficient fixtures required by the District's Municipal Code and plumbing code updates, is projected to save approximately 99 acre-feet of water per year by 2020, which includes a one-percent growth rate to year 2020 as further described on Exhibits 1 and 2, and would double the CCSD's existing water conservation goal as set forth in the UWMP; and

**WHEREAS**, the WUEP is consistent with and implements Cambria Communitywide Condition 4.B ("Condition 4.B") of the North Coast Area Plan, which is part of the San Luis Obispo County Land Use and Circulation Elements of its General Plan, and which also serves as the Local Coastal Plan certified by the California Coastal Commission, which Condition provides that absent a new, major public works water supply project for Cambria, "...new development

resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use..." ; and

**WHEREAS**, consistent with Condition 4.B, the Board of Directors has determined that based upon the water savings that will be achieved through the WUEP, it is in the best interests of the community and provides the greatest public benefit to have an interim program pursuant to which a limited number of Intent to Serve Letters can be issued while the District continues its efforts to develop a major public works project to provide a long-term supplemental water supply; and

**WHEREAS**, although Water Code Section 356 provides the authority for denying new water service connections when there is a declared water shortage emergency, such a prohibition is discretionary and Water Code Section 353 authorizes the Board of Directors to adopt "...such regulations and restrictions on the delivery of water and the consumption...for public use as will in the sound discretion of such governing body conserve the water supply for the greatest public benefit with particular regard to domestic use, sanitation, and fire protection"; and

**WHEREAS**, the Board of Directors now desires to modify the regulations and restrictions that have been adopted to implement the Section 350 Declaration in accordance with its authority under Water Code Section 353 in order to provide for the issuance of Intent to Serve Letters on an interim basis while the District continues to pursue a long-term supplemental water supply project based upon implementation of the WUEP through the use of water demand offsets, in compliance with Condition 4.B; and

**WHEREAS**, the Board of Directors further finds, as set forth below, that the proposed interim issuance of Intent to Serve Letters is consistent with the County of San Luis Obispo Growth Management Ordinance (the "GMO"); and

**WHEREAS**, the Board of Directors finds that the administrative activities to implement the WUEP and the interim issuance of Intent to Serve Letters, as directed by this Resolution will not result in direct or indirect physical changes in the environment and are exempt from CEQA pursuant to CEQA Guidelines Section 15378(b)(5). Also, approval of individual utility service connections are exempt under Section 15268(b)(4). Additionally, the Board of Directors finds that the interim issuance of Intent to Serve Letters is not subject to CEQA review, pursuant to CEQA Guidelines Section 15061(b)(3), and also Section 15378(b)(2), general policy and procedure making, in that the Board is providing direction to create policies and procedures to implement existing Cambria Communitywide Condition 4.B of the North Coast Area Plan, which will be implemented in a manner consistent with and significantly less than the number of dwelling units that could be allowed under the GMO limit and further will be controlled by the

amount of actual water conservation achieved within the District's service area. The District Clerk is directed to file an appropriate notice of exemption.

**NOW, THEREFORE, BE IT RESOLVED**, by the Board of Directors of the Cambria Community Services District as follows:

1. Water Code Section 353 Findings. Water Code Section 353 states in pertinent part: "When the governing body has so determined and declared the existence of an emergency condition of water shortage within its service area, it shall thereupon adopt such regulations and restrictions on the delivery of water and the consumption within said area of water supplied for public use as will in the sound discretion of such governing body conserve the water supply for the greatest public benefit with particular regard to domestic use, sanitation, and fire protection." Based upon this authority and in exercising its sound discretion, in support of the modification of the regulations and restrictions adopted under the Section 350 Declaration in order to provide for issuance of Intent to Serve Letters on an interim basis while the District continues to pursue a long-term supplemental water supply project, the Board of Directors hereby finds and determines that:
  - a. It is the primary purpose of the Cambria Community Services District to provide water and sewer service to the community. The District has a Wait List with 665 properties on it and those property owners have been unable to develop their properties as a result of the Section 350 Declaration and the subsequent adoption of regulations and restrictions that have prohibited new connections and effectively resulted in a moratorium on new development in Cambria. The Board of Directors finds and determines that it is consistent with the District's duties and obligations as the community's water purveyor, to provide for the interim issuance of Intent to Serve Letters that is based upon the water savings that will be achieved through the Water Use Efficiency Plan, while the District continues its efforts to develop a major public works project to provide a long-term supplemental water supply. The Board of Directors further finds that modifying the regulations and restrictions that have been adopted to implement the Section 350 Declaration to provide for the interim issuance of Intent to Serve Letters, constitutes utilization of the water supply in a manner that will provide the greatest public benefit with particular regard to domestic use, sanitation and fire protection.
  - b. The Board of Directors also finds that the issuance of Intent to Serve Letters on an interim basis in reliance upon water savings achieved through the WUEP while the District continues to develop

a long-term supplemental water supply, is wholly consistent with the County General Plan and the Local Coastal Plan in that such a program will implement Cambria Communitywide Condition 4.B of the North Coast Area Plan which provides that "...new development resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use."

2. Growth Management Ordinance. In addition to the foregoing findings related to the modification of the Section 350 Declaration regulations and restrictions, the Board of Directors also finds and declares that:
  - a. The interim issuance of Intent to Serve Letters is consistent with the GMO, since the GMO's allocation of dwelling units is expressly based upon recognition of the CCSD's allocation of resources based upon the CCSD's own resource management policies and ordinances.
  - b. Section 26.01.070 j (1)(a) of the GMO provides an allocation limit of not to exceed 2.3% of the total number of dwelling units within the District. Although the allocation for years July 1, 2012 through June 30, 2015 set forth in GMO Section 26.01.070 j (1)(b) provides an allocation set at 0%, Section 26.01.070 j (1) states that "The CCSD is allocating resources in compliance with its own resource management policies and ordinances, so as to be compatible with the Resource Management System of the County General Plan and to carry out the County's purposes, goals and objectives. In recognition of the management policies in place, the allocation of dwelling units in Cambria shall be conducted as follows..." Accordingly, the CCSD's interim issuance of Intent to Serve Letters, as set forth herein, is hereby declared by the Board of Directors to be an allocation of the CCSD's resources in compliance with the CCSD's resource management policies.

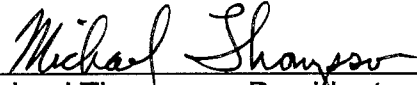
Based upon the foregoing findings and determinations, the Board of Directors hereby directs CCSD Staff to work with County Staff to amend the GMO to permit the interim issuance of Intent to Serve Letters, on the basis of the foregoing and that the issuance of new Intent to Serve Letters, which will be significantly less than the number of dwelling units that could be allowed under the GMO limit and further will be controlled by the amount of actual water conservation achieved within the District's service area.

3. Interim Issuance of Intent to Serve Letters Implementation. The Board of Directors hereby directs the CCSD Staff to implement the WUEP

and the interim issuance of Intent to Serve Letters through the development of administrative procedures and other actions as determined to be necessary and appropriate.

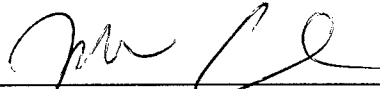
4. The findings set forth above are true, correct and incorporated herein.

PASSED AND ADOPTED THIS 21<sup>st</sup> day of March 2013.



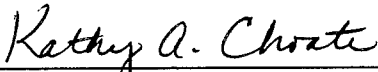
Michael Thompson, President  
Board of Directors

APPROVED AS TO FORM:



Timothy J. Carmel  
District Counsel

ATTEST:



Kathy A. Choate  
District Clerk

Exhibits:

- 1 - Annotated Figure 8-1 from CCSD Water Use Efficiency Plan, as adopted 2/28/2013
- 2 - Annotated Table 8-3 from Water Use Efficiency Plan, as adopted 2/28/2013

Figure 8-1: Water Demand Projections with Water Use Efficiency Program Savings

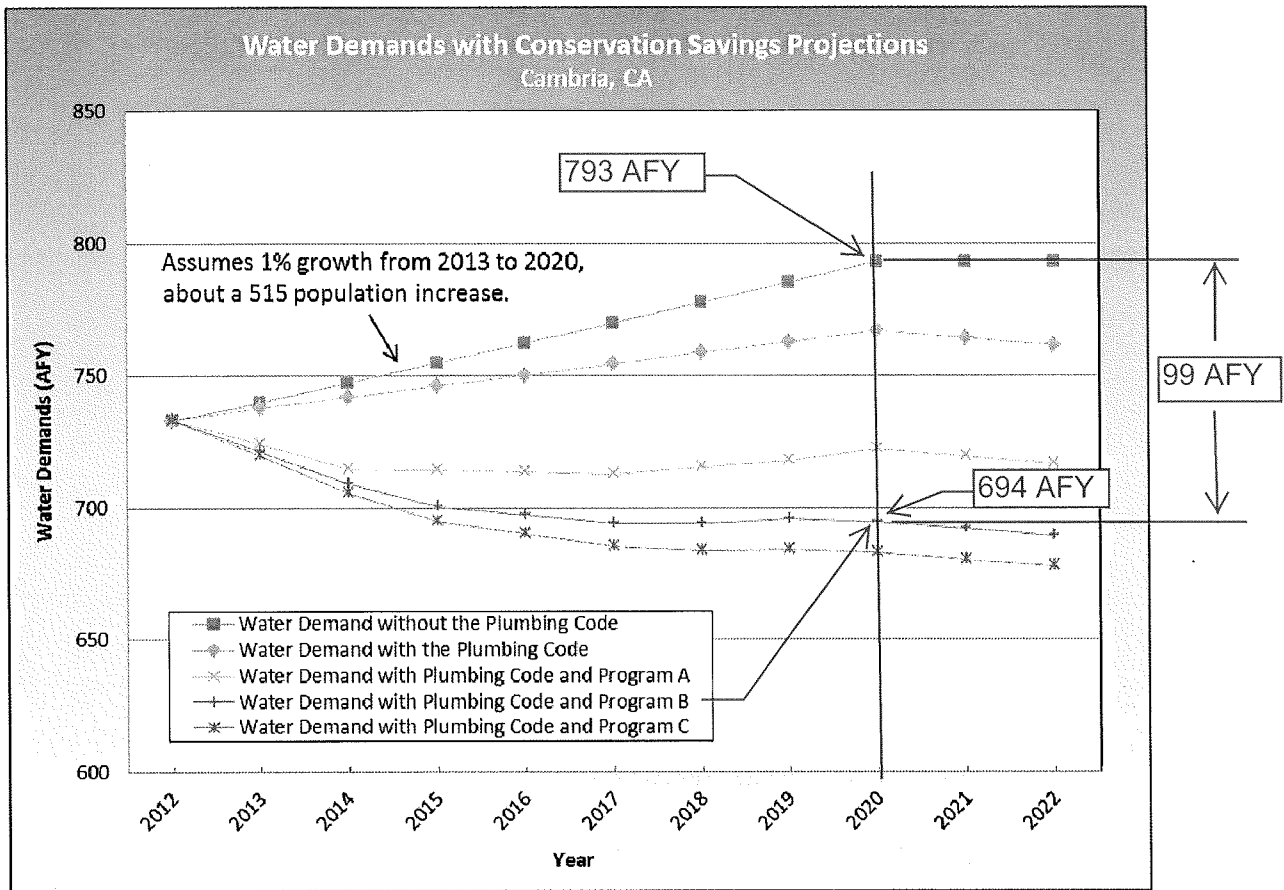


Table 8-1: Long Term Conservation Program Projected Water Savings

Long Term Conservation Program Water Savings Cambria, California					
Water Savings (AFY)	2015	2020	2025	Water Utility Benefit to Cost Ratio	Community Benefit to Cost Ratio
Program A	32	45	45	0.35	0.33
Program B	46	73	71	0.33	0.34
Program C	51	84	83	0.32	0.32

Table 8-3: Comparison of Program Estimated Costs and Water Savings in 2020

Comparison of Conservation Program Costs and Savings Cambria, California									
Conservation Program	Water Utility		Community		2020 Water		2020 Water		Annual Average Water Utility Cost in First Five Years (2013 - 2017)
	Benefit-Cost Ratio	Ratio	Benefit-Cost Ratio	Ratio	Savings (MGD)	(AFY)	Savings (AFY)	Percentage of Total Production in 2020	Water Utility Cost of Water Saved (\$/AF)
Without the Plumbing Code	NA	NA	NA	NA	0.00	0.00	0.00	0.00%	NA
With the Plumbing Code	NA	NA	NA	NA	0.02	26.16	26.16	3.41%	NA
Plumbing Code plus Program A	0.35	0.33	0.33	0.33	0.064	71.26	71.26	9.29%	\$1,296
Plumbing Code plus Program B	0.33	0.34	0.34	0.34	0.088	98.72	98.72	12.87%	\$1,392
Plumbing Code plus Program C	0.32	0.32	0.32	0.32	0.098	110.29	110.29	14.38%	\$1,449

Notes:

- Present Value is determined using an interest rate of 3%
- Present Value of Water Utility Cost based on annual costs (or benefits) over a 30-year period discounted to today's dollars.
- Cost of water saved is present value of water utility cost divided by total 30-year water savings.
- % water saved refers to the demand without the plumbing code
- Total water savings in 2020 as a percent of production is relative to no plumbing code production
- Conversion 1 MGD is equal to 1120 AFY

On 2/28/2103, the CCSD Board chose to adopt the WUEP based on the implementation of Program B

## Notice of Exemption

Appendix E

To: ☐ Office of Planning and Research  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

☐ County Clerk  
County of San Luis Obispo

From: (Public Agency) Cambria Community Services  
District \_\_\_\_\_

(Address)  
P.O. Box 65, Cambria CA 93428

(ENDORSED)

FILED

MAR 22 2013

JULIE L. RODEWALD COUNTY CLERK  
BY ANGELA McCOORMICK  
DEPUTY CLERK

Project Title: Issuance of Intent to Serve Letters through the use of water demand offsets - CCSD Resolution 09-2013

Project Location - Specific: Cambria, CA; water service area for the Cambria Community Services District.

Project Location - City: Cambria Project Location - County: San Luis Obispo

Description of Nature, Purpose, and Beneficiaries of Project: Implement Water Use Efficiency Plan to provide water demand offsets for interim issuance of Intent to Serve letters in compliance with the San Luis Obispo County Local Coastal Plan community wide condition 4.B

and Section 4.14 Water Supply, D1., Mitigation Measures Water 1A; 1B; 1C; 1D; of the 4/4/2006 County-certified EIR entitled Cambria and San

Simeon Acres Community Plans of the North Coast Area Plan

Name of Public Agency Approving Project: Cambria Community Services District

Name of Person or Agency Carrying Out Project: Cambria Community Services District, P.O. Box 65

CAMBRIA, CA 93428

Exempt Status: (check one)

- ☒ Ministerial (Sec. 21080(b)(1); 15268);  
☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));  
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));  
☒ Categorical Exemption. State type and section number:  
☒ Statutory Exemptions. State code number:

Reasons why project is exempt: CEQA 15378(b)(5) - administrative activities implementing water conservation &

interim Intent to Serve Letters will not directly or indirectly cause physical environment changes; 15268(b)(4)- exempts

individual utility service connection approvals; 15378(b)(2) - exempts general policy/procedures implementation;

15061(b) (3) -no possible significant effect on environment.

Lead Agency Robert C. Gresens Area Code/Telephone/Extension: 805-927-6223

If filed by applicant:

1. Attach certified document of exemption finding.  
 2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: Robert C. Gresens Date: 03/22/2013 Title: CCSD District Engineer

ROBERT C. GRESENS

☒ Signed by Lead Agency

Date received for filing at OPR:

☐ Signed by Applicant

Revised October 1989  
 ITEM NO. 32 MEETING DATE: MAY 21, 2013  
 PRESENTED BY: KATHY CHOATE  
 REC'D PRIOR TO MEETING & POSTED ON: MAY 20, 2013





**Fw: AMENDMENT TO SAN LUIS OBISPO COUNTY GROWTH  
MANAGEMENT ORDINANCE (GMO)**

**Cytasha Campa** to: cr\_board\_clerk Clerk Recorder

05/20/2013 10:23 AM

FYI

Cytasha Campa  
Board Secretary  
Board of Supervisors  
San Luis Obispo County  
805-781-4335

----- Forwarded by Cytasha Campa/BOS/COSLO on 05/20/2013 10:21 AM -----

From: Kathy Choate <kchoate@cambriacsd.org>  
To: "ccampa@co.slo.ca.us" <ccampa@co.slo.ca.us>, "fmecham@co.slo.ca.us" <fmecham@co.slo.ca.us>, "bgibson@co.slo.ca.us" <bgibson@co.slo.ca.us>, "ahill@co.slo.ca.us" <ahill@co.slo.ca.us>, "pteixeira@co.slo.ca.us" <pteixeira@co.slo.ca.us>, "darnold@co.slo.ca.us" <darnold@co.slo.ca.us>  
Cc: Jerry Gruber <JGruber@cambriacsd.org>, Amanda Rice <directorrice.ccsd@gmail.com>, "gailgra@charter.net" <gailgra@charter.net>, "hnybrs@aol.com" <hnybrs@aol.com>, "Jim Bahringer (jim@fogsend.com)" <jim@fogsend.com>, "mnclift@charter.net" <mnclift@charter.net>  
Date: 05/17/2013 04:39 PM  
Subject: AMENDMENT TO SAN LUIS OBISPO COUNTY GROWTH MANAGEMENT ORDINANCE (GMO)

---

Good afternoon Cytasha,  
On behalf of CCSD General Manager Jerry Gruber, please find attached a letter regarding CCSD's request for amendments to the GMO with regard to Cambria.

Please enter this letter into the record at the May 21 board of supervisors meeting during the Growth Management Ordinance agenda item.

Thank you,  
Kathy

Kathy Choate  
District Clerk/Adm Asst  
Cambria Community Services District  
PO Box 65  
1316 Tamsen Street Suite 201  
Cambria CA 93428

Direct Line: 805-927-6235  
Fax: 805-927-5584  
Email: [kchoate@cambriacsd.org](mailto:kchoate@cambriacsd.org)  
[www.cambriacsd.org](http://www.cambriacsd.org)

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2013 0517 Signed Ltr to County GMO w attachments.pdf

# CAMBRIA COMMUNITY SERVICES DISTRICT

## DIRECTORS:

MICHAEL THOMPSON, President  
JIM BAHRINGER, Vice President  
MURIL N. CLIFT  
AMANDA RICE  
GAIL ROBINETTE



## OFFICERS:

JEROME D. GRUBER, General Manager  
KATHY A. CHOATE, District Clerk  
TIMOTHY J. CARMEL, District Counsel

1316 Tamsen Street, Suite 201 • P.O. Box 65 • Cambria CA 93428  
Telephone (805) 927-6223 • Facsimile (805) 927-5584

May 17, 2013

Kami Griffin  
Assistant Director  
San Luis Obispo County  
Planning and Building Department  
976 Osos Street, Room 200  
San Luis Obispo, CA 93408

## Re: Amendment to San Luis Obispo County Growth Management Ordinance

Dear Ms. Griffin:

This letter is to follow up to my recent email to you, and the response I received from Senior Planner James Caruso, regarding amendments to the County's Growth Management Ordinance ("GMO") and to summarize the reasons we are requesting the amendments. In Mr. Caruso's email he indicated that we can initiate the process through a letter to you. Accordingly, I am writing to you at this time to request your assistance in moving forward with the process of amending the GMO. Given the positive relationship that exists between the CCSD and the County, we are certain that through a cooperative approach we can accomplish the necessary changes in an expeditious manner.

Mr. Caruso's email indicated that in our letter to you we should describe the CCSD's water conservation program, and suggested that a summary of the Water Use Efficiency Plan ("Plan") be provided. Accordingly, attached to this letter is Section 9 of the Plan. Of course, we will also provide you with a copy of the entire Plan for review. In addition, the CCSD's staff is currently in the process of developing procedures and amendments to the CCSD Municipal Code to implement the Interim Issuance of Intent to Serve Letters, which we expect to take to our Board of Directors within the next 60 days. Generally, this will consist of changes to the CCSD Municipal Code so that District's Water Conservation and Retrofit Program will operate in a manner that will result in offsetting all increased water use through the retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use.

To summarize what has taken place to this point, on March 21, 2013 the Board of Directors of the Cambria Community Services District ("CCSD") adopted a resolution (CCSD Resolution 09-2013) to provide for the issuance of intent to serve letters while the District continues to pursue a long-term supplemental water supply project ("Interim Issuance of Intent to Serve Letters"). A copy of Resolution 09-2013 is attached for your reference. Resolution 09-2013 modified the regulations and restrictions that were previously adopted to implement the CCSD's Water Code Section 350 Water Shortage Emergency that was declared on November 15, 2001. Resolution 09-2013 will provide for

ITEM NO. 32 MEETING DATE: MAY 21, 2013  
PRESENTED BY: CYTASHA CAMPA  
REC'D PRIOR TO MEETING & POSTED ON: MAY 20, 2013

the Interim Issuance of Intent to Serve Letters, based upon offsetting increased water use through the retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use. As with any program that will allow new development, there are some in Cambria who oppose this new program and who opposed the adoption of Resolution 09-2013. This included an attorney who questioned the CEQA exemptions being used. There was some concern that a lawsuit would be filed that would cause unwarranted and unnecessary delays (a copy of the Notice of Exemption is attached for your reference). No legal challenge, however, has been filed within the statutory period.

As you can see from a review of Resolution 09-2013, issuing Intent to Serve Letters predicated upon demonstrable offsetting of all increased water use through water conservation is consistent with and implements Cambria Communitywide Condition 4.B ("Condition 4.B") of the North Coast Area Plan, which as you know is part of the San Luis Obispo County's General Plan. That Condition provides that absent a new, major public works water supply project for Cambria, "...new development resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use..."

As you know, the County's GMO provides for an allocation limit for Cambria of not to exceed 2.3%, however, the allocation for years July 1, 2012 through June 30, 2015, contained in County Code Section 26.01.070 j (1)(b) has been set at 0%. The GMO's allocation of dwelling units is based upon a recognition of the CCSD's own allocation of resources, as provided in the District's management policies and ordinances. In this regard the CCSD's newly approved water management policy that provides for the Interim Issuance of Intent to Serve Letters will implement the existing Cambria Community Condition 4.B of the North Coast Area Plan. Moreover, it will result in significantly less than the number of dwelling units that could be allowed under the County's 2.3% GMO limit and will be further controlled by the amount of actual water conservation achieved within the District's service area. Therefore, it is appropriate for the County to amend the GMO to recognize and accommodate the CCSD's new allocation of resources, as provided for in Resolution 09-2013.

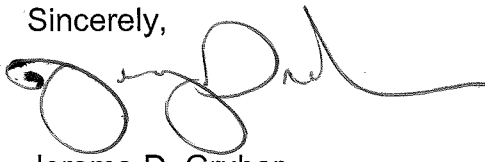
Mr. Caruso's email asked that we include a requested growth rate. The current draft of the Administrative Policy that we intend to take to our Board of Directors in June includes a procedure for the Board to determine on a quarterly basis of each allocation year how many Intent to Serve Letters are to be made available for issuance that quarter. The determination is to be based upon an analysis presented by CCSD staff related to the status of the CCSD's Points Bank and the amount of water conservation being achieved in the CCSD service area. The Points Bank represent retrofit points that accrue from the installation of high-efficiency water use fixtures and devices that result from retrofits required when there is a change of ownership or use (CCSD Municipal Code Section 4.16.050), expansion of use (CCSD Municipal Code Section 4.16.060), resale (4.16.070), CCSD rebate programs, and other actions by the CCSD to achieve verifiable reductions in existing water use in the Districts service area. In addition, the Board's determination is to take into account projections related to the amount of water savings that will be achieved by new projects, based upon installation of water savings plumbing fixtures and devices at the properties to be served by the new connections, and related demand offset calculations. The Administrative Policy will also provide that the number of new water connections are not to exceed the number of dwelling units permitted by the County's GMO.

Mr. Caruso also requested that we summarize the status of the CCSD's supplemental water project. At this time a draft EIR/EIS on Water Supply Alternatives is currently being prepared by the Army Corp of Engineers. Based upon the schedule prepared by the Army Corp, we anticipate that the draft EIR/EIS will be ready for distribution for the public review period in early January, 2014.

At this time we are respectfully requesting your assistance in initiating the process so that an agenda item can be prepared for the Board of Supervisors as soon as possible, allowing consideration of an appropriate amendment to the County's Growth Management Ordinance.

Please contact me as soon as possible so that we can discuss how best to proceed in this important matter. Thank you for consideration.

Sincerely,



Jerome D. Gruber  
General Manager  
Cambria Community Services District

JDG:kac

C: CCSD Board of Directors  
SLO County Board of Supervisors

Attachments: Section 9 from Draft Final Water Use Efficiency Plan for the Cambria Community Services District. Prepared by Maddaus Water Management, dated February 21, 2013  
CCSD Resolution 09-2013  
Notice of Exemption – Issuance of Intent to Serve Letters, Filed March 22, 2013

## **Section 9 from Draft Final Water Use Efficiency Plan for the Cambria Community Services District. Prepared by Maddaus Water Management, dated February 21, 2013**

### **9 . RECOMMENDED PLAN**

This section presents an overview of the recommended conservation plan for the Cambria Community Services District service area. The recommended plan includes several elements: (1) how the plan was selected from the alternatives presented in Section 8; (2) a more detailed description of the components including goals; (3) overall benefits of the plan; and (4) recommended next steps.

#### **9.1 Selection Criteria and Process**

The recommended plan was presented at a regularly scheduled Cambria CSD Board meeting held January 17, 2013. MWM presented the results of the evaluation of water conservation issues and options for Cambria CSD.

This activity brought the Board to a common level of understanding of water conservation issues for Cambria CSD. MWM also explained the various conservation program options that they had prepared for the Cambria CSD.

Decision criteria were reviewed with the group and were as follows:

- Cost-Effectiveness
- Water Savings
- Ease of Implementation
- Availability of Technology
- Average Annual Cost

#### **9.2 Description of Recommended Plan**

The recommended plan is to begin to implement Program B and after a few years consider expanding the plan to encompass Program C. The recommended plan's 16 measures are listed below.

##### **Recommended Measures in the Plan**

1. Reduce System Water Losses
2. Use Automatic Meter Reading System to Identify Customer Leaks
3. Public Information and Education
4. Single Family Surveys
5. Showerhead Giveaway
6. High Efficiency Toilet Rebates
7. High Efficiency Urinal Replacement
8. Fixture Replacement by ordinance
9. CII Surveys

10. Large Meter Replacement
11. Irrigation Upgrades
12. Multifamily Surveys
13. High Efficiency Washing Machine Rebates
14. Conservation Pricing
15. Implement CCSD Municipal Code to Prohibit Irrigation Water Waste
16. Hot Water Recirculation Incentive

### 9.3 Projected Water Savings of Plan

The Cambria CSD's service area has a relatively high portion of residential water use. Consequently, residential conservation programs produce the most savings. The Cambria CSD's service area is not an intense commercial area, and as a result the conservation potential in the commercial sector is less.

Overall conclusions are:

- The Plan (Program B) without the plumbing Code is estimated to save approximately 70 acre-feet by the year 2020. The benefit-cost ratio of the plan is less than 1.0 when compared to the current cost of pumping groundwater. However, Cambria has water supply constraints, so comparing the cost of conservation to the cost of the current supply may not be appropriate.
- Total savings from Program B is 10 percent (without the plumbing code) in 2020.
- The average cost of water saved for the plan from the utility standpoint (as shown on Table 8-4) is \$1,400 per AF.
- The cost for the conservation measures could be largely funded by the builders of the new homes.

### 9.6 Estimated Implementation Budget

The cost to Cambria CSD to implement the recommended plan is approximately \$300,000 per year of additional budget and includes additional staff time, materials, rebates, giveaways, etc. This budget was developed as part of the DSS Model evaluations for level of activity by year. The opportunities for State grants or cost sharing partnership with other County utilities or other means for lowering the cost of a conservation measure would lower the budgetary needs for implementation. The Cambria CSD should develop a detailed annual work plan, and use the DSS Model to monitor progress on demand reductions; along with updates to the implementation cost estimates and associated budgets on an annual basis.

### 9.7 Monitoring Progress

Each year a progress update will be used to analyze the progress on meeting the Plan targeted water savings. It will be imperative to track activities and also water demand to understand the level of progress being made in meeting overall targets.

### 9.8 Challenges Ahead and Recommended Next Steps

Successful implementation of the Plan will require a significant increase in efforts on the part of the Cambria CSD. Many new conservation measures will be employed and high participation rates are needed to achieve Plan goals. At current staffing and budget levels Cambria CSD would have difficulty implementing such an aggressive conservation program. Additional resources are needed.

Recommendations to assist with implementation include the following next steps:

- Budget an additional \$300,000 per year to cover the added cost of implementing this plan.
- Recover the costs by adjusting the current points program as needed or consider charging extra for new water meters to pay for the plan.
- Prioritize measures for implementation with those that contribute the most to meeting water saving targets given highest priority for implementation.
- Consider working with the largest water using customers to try to reduce water use as described in section 3.
- Develop an Implementation Plan that describes exactly how the plan measures will be implemented.
- Develop an annual work plan for each plan year as soon as budget is adopted (or in concert with budget planning process).
- Update codes and ordinances, as necessary.
- Form partnerships and apply for grants where appropriate.
- Contract if needed to gain enough staff support to help administer or accelerate the new program measures.
- Maintain the Cambria CSD Staff Conservation Working Group to guide the implementation.
- Develop analytical tools to track water use by customer class and overall water use reductions adjusted for the weather and external factors.
- Set up a database to store and manage measure participation, cost and other data to gauge successes and failures.
- Use the tools annually to help decide on priorities for the next plan year.
- Use the DSS Model to annually update the plan including actual measure participation, projected water savings and expected per capita water use reductions to ensure plan is on track to meet 2020 targets.
- Use the input from the Cambria CSD Staff Working Group and annual work planning process as the forum to amend the plan, budgets, staffing, contracting, schedule etc. to stay on track.



**RESOLUTION NO. 09-2013  
March 21, 2013**

**A RESOLUTION OF THE BOARD OF DIRECTORS  
OF THE CAMBRIA COMMUNITY SERVICES DISTRICT  
APPROVING THE ISSUANCE OF INTENT TO SERVE  
LETTERS ON AN INTERIM BASIS WHILE  
THE DISTRICT CONTINUES TO PURSUE A  
LONG-TERM SUPPLEMENTAL WATER SUPPLY PROJECT  
("INTERIM ISSUANCE OF INTENT TO SERVE LETTERS")**

**WHEREAS**, on November 15, 2001, after holding public hearings and receiving evidence and testimony the Board of Directors of the Cambria Community Services District ("District") determined that there was sufficient evidence to support the declaration of a water shortage emergency pursuant to the provisions of Section 350 of the California Water Code ("the Section 350 Declaration"); and

**WHEREAS**, thereafter, the Board of Directors also adopted regulations and restrictions pursuant to Water Code Section 353 to implement the Section 350 Declaration, which included the immediate suspension of the issuance of any additional intent to serve letters, which had the effect of creating a moratorium on new water service commitments; and

**WHEREAS**, on February 28, 2013 the Board of Directors approved a Water Use Efficiency Plan (the "WUEP"), which Plan will further the CCSD's Urban Water Master Plan (the "UWMP") goal of significantly reducing per capita water use, and make Cambria more sustainable within its existing water supply, as well as providing water to potentially serve a limited number of new connections while the CCSD pursues a long-term supplemental water supply project; and

**WHEREAS**, the implementation of "Program B" of the WUEP, in combination with more water efficient fixtures required by the District's Municipal Code and plumbing code updates, is projected to save approximately 99 acre-feet of water per year by 2020, which includes a one-percent growth rate to year 2020 as further described on Exhibits 1 and 2, and would double the CCSD's existing water conservation goal as set forth in the UWMP; and

**WHEREAS**, the WUEP is consistent with and implements Cambria Communitywide Condition 4.B ("Condition 4.B") of the North Coast Area Plan, which is part of the San Luis Obispo County Land Use and Circulation Elements of its General Plan, and which also serves as the Local Coastal Plan certified by the California Coastal Commission, which Condition provides that absent a new, major public works water supply project for Cambria, "...new development

resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use..." ; and

**WHEREAS**, consistent with Condition 4.B, the Board of Directors has determined that based upon the water savings that will be achieved through the WUEP, it is in the best interests of the community and provides the greatest public benefit to have an interim program pursuant to which a limited number of Intent to Serve Letters can be issued while the District continues its efforts to develop a major public works project to provide a long-term supplemental water supply; and

**WHEREAS**, although Water Code Section 356 provides the authority for denying new water service connections when there is a declared water shortage emergency, such a prohibition is discretionary and Water Code Section 353 authorizes the Board of Directors to adopt "...such regulations and restrictions on the delivery of water and the consumption...for public use as will in the sound discretion of such governing body conserve the water supply for the greatest public benefit with particular regard to domestic use, sanitation, and fire protection"; and

**WHEREAS**, the Board of Directors now desires to modify the regulations and restrictions that have been adopted to implement the Section 350 Declaration in accordance with its authority under Water Code Section 353 in order to provide for the issuance of Intent to Serve Letters on an interim basis while the District continues to pursue a long-term supplemental water supply project based upon implementation of the WUEP through the use of water demand offsets, in compliance with Condition 4.B; and

**WHEREAS**, the Board of Directors further finds, as set forth below, that the proposed interim issuance of Intent to Serve Letters is consistent with the County of San Luis Obispo Growth Management Ordinance (the "GMO"); and

**WHEREAS**, the Board of Directors finds that the administrative activities to implement the WUEP and the interim issuance of Intent to Serve Letters, as directed by this Resolution will not result in direct or indirect physical changes in the environment and are exempt from CEQA pursuant to CEQA Guidelines Section 15378(b)(5). Also, approval of individual utility service connections are exempt under Section 15268(b)(4). Additionally, the Board of Directors finds that the interim issuance of Intent to Serve Letters is not subject to CEQA review, pursuant to CEQA Guidelines Section 15061(b)(3), and also Section 15378(b)(2), general policy and procedure making, in that the Board is providing direction to create policies and procedures to implement existing Cambria Communitywide Condition 4.B of the North Coast Area Plan, which will be implemented in a manner consistent with and significantly less than the number of dwelling units that could be allowed under the GMO limit and further will be controlled by the

amount of actual water conservation achieved within the District's service area. The District Clerk is directed to file an appropriate notice of exemption.

**NOW, THEREFORE, BE IT RESOLVED**, by the Board of Directors of the Cambria Community Services District as follows:

1. Water Code Section 353 Findings. Water Code Section 353 states in pertinent part: "When the governing body has so determined and declared the existence of an emergency condition of water shortage within its service area, it shall thereupon adopt such regulations and restrictions on the delivery of water and the consumption within said area of water supplied for public use as will in the sound discretion of such governing body conserve the water supply for the greatest public benefit with particular regard to domestic use, sanitation, and fire protection." Based upon this authority and in exercising its sound discretion, in support of the modification of the regulations and restrictions adopted under the Section 350 Declaration in order to provide for issuance of Intent to Serve Letters on an interim basis while the District continues to pursue a long-term supplemental water supply project, the Board of Directors hereby finds and determines that:
  - a. It is the primary purpose of the Cambria Community Services District to provide water and sewer service to the community. The District has a Wait List with 665 properties on it and those property owners have been unable to develop their properties as a result of the Section 350 Declaration and the subsequent adoption of regulations and restrictions that have prohibited new connections and effectively resulted in a moratorium on new development in Cambria. The Board of Directors finds and determines that it is consistent with the District's duties and obligations as the community's water purveyor, to provide for the interim issuance of Intent to Serve Letters that is based upon the water savings that will be achieved through the Water Use Efficiency Plan, while the District continues its efforts to develop a major public works project to provide a long-term supplemental water supply. The Board of Directors further finds that modifying the regulations and restrictions that have been adopted to implement the Section 350 Declaration to provide for the interim issuance of Intent to Serve Letters, constitutes utilization of the water supply in a manner that will provide the greatest public benefit with particular regard to domestic use, sanitation and fire protection.
  - b. The Board of Directors also finds that the issuance of Intent to Serve Letters on an interim basis in reliance upon water savings achieved through the WUEP while the District continues to develop

a long-term supplemental water supply, is wholly consistent with the County General Plan and the Local Coastal Plan in that such a program will implement Cambria Communitywide Condition 4.B of the North Coast Area Plan which provides that "...new development resulting in increased water use shall offset such increase through retrofit of existing water fixtures within the Cambria Community Services District's service area, or through other verifiable actions to reduce existing water use."

2. Growth Management Ordinance. In addition to the foregoing findings related to the modification of the Section 350 Declaration regulations and restrictions, the Board of Directors also finds and declares that:
  - a. The interim issuance of Intent to Serve Letters is consistent with the GMO, since the GMO's allocation of dwelling units is expressly based upon recognition of the CCSD's allocation of resources based upon the CCSD's own resource management policies and ordinances.
  - b. Section 26.01.070 j (1)(a) of the GMO provides an allocation limit of not to exceed 2.3% of the total number of dwelling units within the District. Although the allocation for years July 1, 2012 through June 30, 2015 set forth in GMO Section 26.01.070 j (1)(b) provides an allocation set at 0%, Section 26.01.070 j (1) states that "The CCSD is allocating resources in compliance with its own resource management policies and ordinances, so as to be compatible with the Resource Management System of the County General Plan and to carry out the County's purposes, goals and objectives. In recognition of the management policies in place, the allocation of dwelling units in Cambria shall be conducted as follows..." Accordingly, the CCSD's interim issuance of Intent to Serve Letters, as set forth herein, is hereby declared by the Board of Directors to be an allocation of the CCSD's resources in compliance with the CCSD's resource management policies.

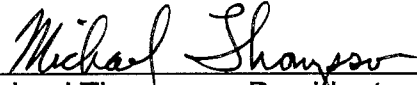
Based upon the foregoing findings and determinations, the Board of Directors hereby directs CCSD Staff to work with County Staff to amend the GMO to permit the interim issuance of Intent to Serve Letters, on the basis of the foregoing and that the issuance of new Intent to Serve Letters, which will be significantly less than the number of dwelling units that could be allowed under the GMO limit and further will be controlled by the amount of actual water conservation achieved within the District's service area.

3. Interim Issuance of Intent to Serve Letters Implementation. The Board of Directors hereby directs the CCSD Staff to implement the WUEP

and the interim issuance of Intent to Serve Letters through the development of administrative procedures and other actions as determined to be necessary and appropriate.

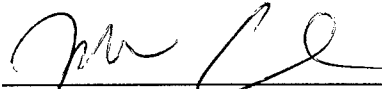
4. The findings set forth above are true, correct and incorporated herein.

PASSED AND ADOPTED THIS 21<sup>st</sup> day of March 2013.



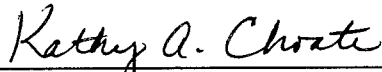
Michael Thompson, President  
Board of Directors

APPROVED AS TO FORM:



Timothy J. Carmel  
District Counsel

ATTEST:



Kathy A. Choate  
District Clerk

Exhibits:

- 1 - Annotated Figure 8-1 from CCSD Water Use Efficiency Plan, as adopted 2/28/2013
- 2 - Annotated Table 8-3 from Water Use Efficiency Plan, as adopted 2/28/2013

Figure 8-1: Water Demand Projections with Water Use Efficiency Program Savings

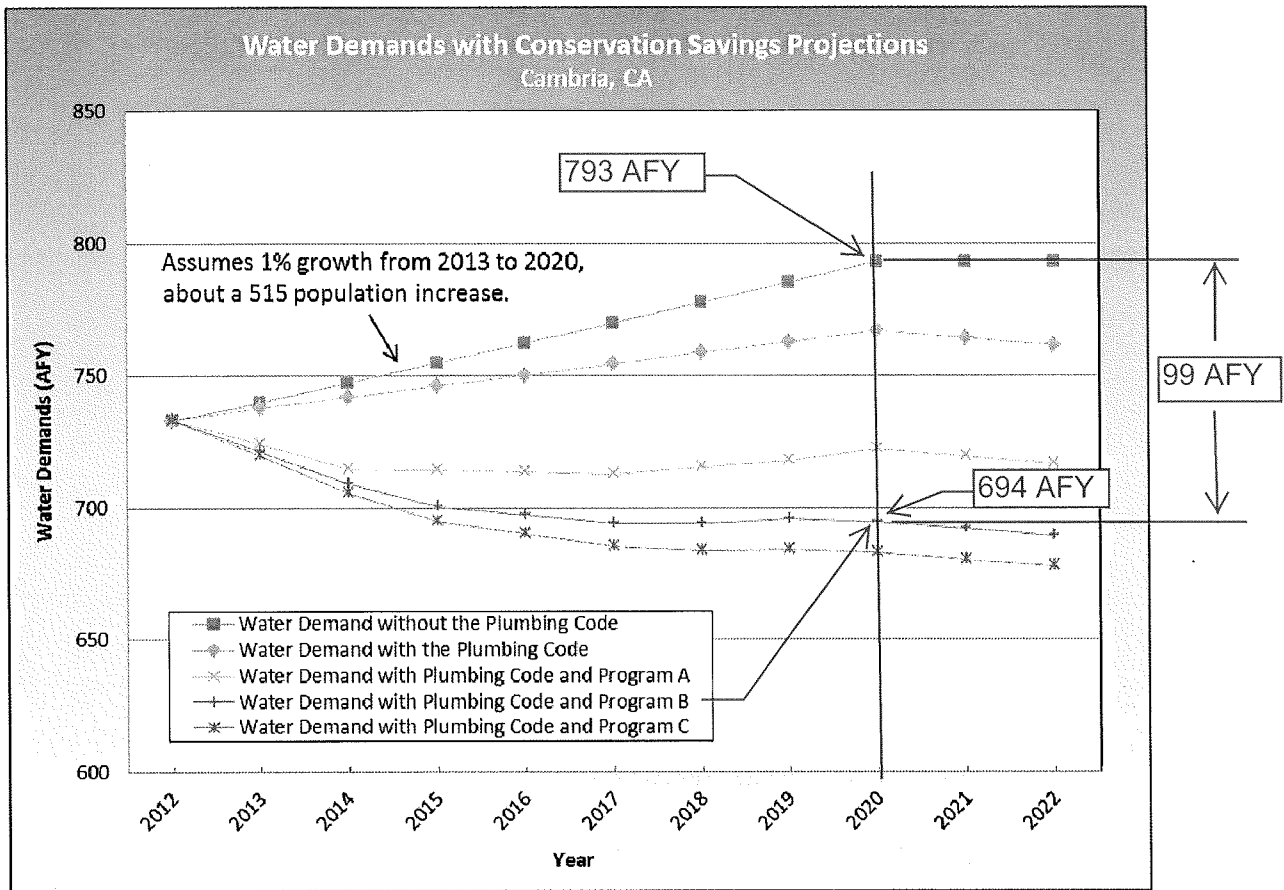


Table 8-1: Long Term Conservation Program Projected Water Savings

Long Term Conservation Program Water Savings Cambria, California					
Water Savings (AFY)	2015	2020	2025	Water Utility Benefit to Cost Ratio	Community Benefit to Cost Ratio
Program A	32	45	45	0.35	0.33
Program B	46	73	71	0.33	0.34
Program C	51	84	83	0.32	0.32

Table 8-3: Comparison of Program Estimated Costs and Water Savings in 2020

Comparison of Conservation Program Costs and Savings  
Cambria, California

Conservation Program	Water Utility		Community	2020 Water		2020 Water	2020 Water		Present Value	Annual		Water Utility	Water Utility	
	Benefit-Cost	Ratio	Benefit-Cost	Ratio	Savings	(MGD)	Savings	(AFY)	of Water	Utility Costs	Cost in First	Cost of Water	Cost in First	Cost of Water
Without the Plumbing Code	NA	NA	NA	NA	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA
With the Plumbing Code	NA	NA	NA	NA	0.02	0.02	26.16	26.16	NA	NA	NA	NA	NA	NA
Plumbing Code plus Program A	0.35	0.33	0.33	0.33	0.064	0.064	71.26	71.26	\$1,620,732	\$142,265	\$142,265	\$1,296	\$1,296	\$1,296
Plumbing Code plus Program B	0.33	0.34	0.34	0.34	0.088	0.088	98.72	98.72	\$2,828,761	\$302,323	\$302,323	\$1,392	\$1,392	\$1,392
Plumbing Code plus Program C	0.32	0.32	0.32	0.32	0.098	0.098	110.29	110.29	\$3,396,958	\$379,561	\$379,561	\$1,449	\$1,449	\$1,449

Notes:

- Present Value is determined using an interest rate of 3%
- Present Value of Water Utility Cost based on annual costs (or benefits) over a 30-year period discounted to today's dollars.
- Cost of water saved is present value of water utility cost divided by total 30-year water savings.
- % water saved refers to the demand without the plumbing code
- Total water savings in 2020 as a percent of production is relative to no plumbing code production
- Conversion 1 MGD is equal to 1120 AFY

On 2/28/2103, the CCSD Board chose to adopt the WUEP based on the implementation of Program B

## Notice of Exemption

Appendix E

To: ☐ Office of Planning and Research  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

☐ County Clerk  
County of San Luis Obispo

From: (Public Agency) Cambria Community Services  
District \_\_\_\_\_

(Address)  
P.O. Box 65, Cambria CA 93428

(ENDORSED)

FILED

MAR 22 2013

JULIE L. RODEWALD COUNTY CLERK  
BY ANGELA McCOORMICK  
DEPUTY CLERK

Project Title: Issuance of Intent to Serve Letters through the use of water demand offsets - CCSD Resolution 09-2013

Project Location - Specific: Cambria, CA; water service area for the Cambria Community Services District.

Project Location - City: Cambria Project Location - County: San Luis Obispo

Description of Nature, Purpose, and Beneficiaries of Project: Implement Water Use Efficiency Plan to provide water demand offsets for interim issuance of Intent to Serve letters in compliance with the San Luis Obispo County Local Coastal Plan community wide condition 4.B

and Section 4.14 Water Supply, D1., Mitigation Measures Water 1A; 1B; 1C; 1D; of the 4/4/2006 County-certified EIR entitled Cambria and San

Simeon Acres Community Plans of the North Coast Area Plan

Name of Public Agency Approving Project: Cambria Community Services District

Name of Person or Agency Carrying Out Project: Cambria Community Services District, P.O. Box 65

CAMBRIA, CA 93428

Exempt Status: (check one)

- ☒ Ministerial (Sec. 21080(b)(1); 15268);  
☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));  
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));  
☒ Categorical Exemption. State type and section number:  
☒ Statutory Exemptions. State code number:

Reasons why project is exempt: CEQA 15378(b)(5) - administrative activities implementing water conservation &

interim Intent to Serve Letters will not directly or indirectly cause physical environment changes; 15268(b)(4)- exempts

individual utility service connection approvals; 15378(b)(2) - exempts general policy/procedures implementation;

15061(b) (3) -no possible significant effect on environment.

Lead Agency Robert C. Gresens Area Code/Telephone/Extension: 805-927-6223

If filed by applicant:

1. Attach certified document of exemption finding.  
 2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: Robert C. Gresens Date: 03/22/2013 Title: CCSD District Engineer

ROBERT C. GRESSENS

☒ Signed by Lead Agency

Date received for filing at OPR:

☐ Signed by Applicant

Revised October 1989  
 ITEM NO. 32 MEETING DATE: MAY 21, 2013  
 PRESENTED BY: CYTASHA CAMPA  
 REC'D PRIOR TO MEETING & POSTED ON: MAY 20, 2013  
 APPENDICES